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6 7 8 9 110 111	Bradley O. Cebeci, Esq. (<i>Pro Hac Vice</i>) Brianna Dahlberg, Esq. (<i>Pro Hac Vice</i>) ROME & ASSOCIATES, A.P.C. 2029 Century Park East, Suite 450 Los Angeles, California 90067 Telephone: (310) 282-0690 Facsimile: (310) 282-0691 erome@romeandassociates.com bcebeci@romeandassociates.com bdahlberg@romeandassociates.com				
12 13 14 15 16	Bradley S. Slighting (10225) BOYACK LAW GROUP 1707 Village Center Circle, #100 Las Vegas, NV 89134 Tel: (702) 744-7474 brad@boyacklawgroup.com Attorneys for Defendant/Counterclaimant, BEYOND WEALTH PTE LLC				
18	UNITED STATES DISTRICT COURT				
19	DISTRICT OF NEVADA, SOUTHERN DIVISION				
220 221 222 223 224 225 226 227 227	T1 PAYMENTS LLC, a Nevada limited liability company, Plaintiff, vs. BEYOND WEALTH PTE LLC, a Utah limited liability company, Defendant. [And related Counterclaim]	CASE No. 2:20-CV-01405-JCM-VCF STIPULATION TO EXTEND TIME FOR BEYOND WEALTH PTE LLC TO RESPOND TO PAYVISION B.V.'S MOTION TO DISMISS FIRST AMENDED COUNTERCLAIM			
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1	Counterclaimant Beyond Wealth PTE LLC, a Utah limited liability company ("Beyond		
2	Wealth") and Counterclaim-Defendant Payvision B.V., a Dutch limited liability company		
3	("Payvision"), through their respective counsel, hereby stipulate and agree as follows:		
4	WHEREAS, on November 9, 2020, Payvision filed a motion to dismiss ("Motion")		
5	Beyond Wealth's First Amended Counterclaim ("FAC");		
6	WHEREAS, pursuant to Local Rule LR 7-2, Beyond Wealth originally had fourteen days		
7	to file a response to the Motion, which would have been Monday, November 23, 2020;		
8	WHEREAS, on December 2, 2020, the Court granted Payvision and Beyond Wealth's		
9	previous stipulation extending the deadline for Beyond Wealth response to the Motion to		
10	December 7, 2020 and extending the deadline for Payvision's reply to the Motion to December 14		
11	2020 (see ECF No. 135);		
12	WHEREAS, on December 7, 2020, Payvision and Beyond Wealth discussed potential		
13	settlement options, which both sides will require time to review;		
14	WHEREAS, on December 7, 2020, counsel for Beyond Wealth and counsel for Payvision		
15	agreed to extend the time for Beyond Wealth to respond to the Motion by one week until		
16	December 14, 2020, and for Payvision to reply to Beyond Wealth's response by one week until		
17	December 21, 2020;		
18	NOW, THEREFORE, Beyond Wealth and Payvision hereby stipulate and agree as		
19	follows:		
20	1. Beyond Wealth's response to the Motion shall be due December 14, 2020;		
21	2. Payvision's reply to Beyond Wealth's response to the Motion shall be due		
22	December 21, 2020;		
23	3. All discovery and Rule 26 disclosure deadlines between Beyond Wealth and		
24	Payvision are also continued for a period of one week.		
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1	DATED: December 7, 2020	DATED: December 7, 2020		
2	GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP	WELLMAN & WARREN LLP		
3				
4	By:/s/ Richard Haskin	By:/s/ Scott Wellman		
5	Richard E. Haskin, Esq. Attorneys for PAYVISION B.V., a	Scott Wellman		
6	Netherlands limited liability company.	Attorneys for Beyond Wealth PTE LLC, a Utah limited liability company.		
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8		DISTRICT COLLET		
9		DISTRICT COURT		
10	DISTRICT OF NEVADA	A, SOUTHERN DIVISION		
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12	T1 PAYMENTS LLC, a Nevada limited liability company,	CASE No. 2:20-CV-01405-JCM-VCF		
13	Plaintiff,	ORDER GRANTING STIPULATION TO EXTEND TIME FOR		
14	vs.	BEYOND WEALTH PTE LLC TO RESPOND TO PAYVISION B.V.'S		
15	BEYOND WEALTH PTE LLC, a Utah	MOTION TO DISMISS FIRST AMENDED COUNTERCLAIM		
16	limited liability company,			
17	Defendant.			
18	BEYOND WEALTH PTE LLC, a Utah			
19	limited liability company,			
20	Counterclaimant,			
21	VS.			
22	T1 PAYMENTS LLC, a Nevada limited liability company, et al.,			
23	Counterclaim-Defendants.			
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	1258130.1	Case No. 2:20-CV-01405-JCM-VCF		
	[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME FOR BEYOND WEALTH PTE LLC TO RESPOND TO PAYVISION B.V.'S MOTION TO DISMISS FIRST AMENDED COUNTERCLAIM			

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1	This C	Court, having considered the foregoing stipulation of the parties and finding good	
2	cause therefore, IT IS ORDERED that:		
3	1.	Beyond Wealth's response to Payvision's pending Motion to Dismiss shall be due	
4		December 14, 2020;	
5	2.	Payvision's reply to Beyond Wealth's response to the Motion shall be due	
6		December 21, 2020;	
7	3.	All discovery and Rule 26 disclosure deadlines between Beyond Wealth and	
8		Payvision are also continued for a period of one week.	
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1	DATED: _De	ecember 9, 2020	
2		UNITED STATES DISTRICT JUDGE	
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